



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

March 22, 2006

Sim Farar, Treasurer
PAC for a Change
777 S. Figueroa St., Suite 4050
Los Angeles, CA 90017

Response Due Date:
April 21, 2006

Identification Number: C00342048

Reference: Year End Report (7/1/05-12/31/05)

Dear Mr. Farar:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. **An adequate response must be received at the Commission by the response date noted above.** An itemization of the information needed follows:

-The totals listed on Lines 11(a)(i) and 11(a)(ii), Column B of the Detailed Summary Page appear to be incorrect. Please be advised that you should add the "Calendar Year-to-Date" total from your previous report to the current "Total This Period" figure from Column A to derive the correct Column B totals. When an individual's aggregate exceeds the \$200 threshold, the amount should not be deducted from the Column B figure for Line 11(a)(ii). Please amend your report and any subsequent reports that may be affected by this correction.

-You have received a contribution from "VPR Associates LLC," which appears to be an unincorporated proprietorship or partnership. You have indicated that this receipt is to be attributed to "Vincent Reusing"; however, this individual's information is disclosed in a regular entry instead of in a memo entry. This method of reporting inflates your committee's total receipts for the reporting period by double counting the amount of the partnership contribution. Please amend your report to disclose this individual's entry as a memo entry.

-Please clarify all expenditures made for "Fundraising Consulting Fees," "Fundraising Event Expenses," and "Fundraising Expenses" on Schedule

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B. If a portion or all of these expenditures were made on behalf of specifically identified federal candidates, this amount should be disclosed on Schedules B or E supporting Lines 23 or 24 and include the amount, name, address and office sought by each candidate. 11 CFR §§104.3(b) and 106.1

-Schedule B discloses an expenditure(s) for "Mailhouse Services/Postage," "Postage," "Printing Services," and "Shipping/Postage." If a portion or all of these expenditures were for public communications (as defined by 11 CFR §100.26) and voter drive activity (under 11 CFR §106.6(b)(2)(i)) containing express advocacy as defined under 11 CFR §100.22, this would constitute an in-kind contribution or an independent expenditure and should be properly disclosed on a Schedule B or E supporting Line 23 or 24 as appropriate. Public communications and voter drive activity that refer to a clearly identified Federal candidate, but that do not expressly advocate the election or defeat of that candidate should be reported on Schedule B for Line 21(b) of the Detailed Summary Page. Please clarify whether this activity contained express advocacy and amend your report to properly disclose this activity, if necessary.

-Your report disclosed a category of financial activity that apparently has been reflected on the wrong line of the Detailed Summary Page. Contributions to federal candidates should be properly disclosed on a separate Schedule B, supporting Line 23 of the Detailed Summary Page. Please amend your report to clarify this apparent discrepancy.

-For future reporting, please be advised that only contributions to federal candidates and political committees should be itemized on a separate Schedule B supporting Line 23 of the Detailed Summary Page. Contributions to non-federal candidates and committees should be itemized on Schedule B supporting Line 29.

-Commission records indicate that your official address is different from the address disclosed on the Summary Page of your 2005 Year End Report. If your committee has changed its address, please disclose the new address on an amended Statement of Organization or check the address-change box on the Summary Page of your report to indicate an address change. Please provide clarifying information regarding this discrepancy.

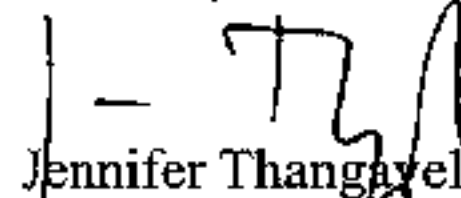
Please note, you will not receive an additional notice from the Commission on this matter. Adequate responses received on or before this date will be taken into consideration in determining whether audit action will be initiated. **Requests for extensions of time in which to respond will not be considered.** Failure to provide an

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adequate response by this date may result in an audit of the committee. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action.

Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you should have any questions regarding this matter or wish to verify the adequacy of your response, please contact me on our toll-free number (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division) or my local number (202) 694-1143.

Sincerely,



Jennifer Thangayelu
Campaign Finance Analyst
Reports Analysis Division

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